

DEFENDANTS'

EXHIBIT 37

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

STUDENTS FOR JUSTICE IN PALESTINE,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 2:25-cv-00524-NR
)	
UNIVERSITY OF PITTSBURGH, <i>et al.</i>)	
)	
Defendant.)	

DECLARATION OF ZACHARY DAVIS

I, Zachary Davis, do hereby state under oath as follows:

1. At the time of the February 4, 2025 hearing described in this Declaration below, I was the Director of Equity and Inclusion Programs for the University of Pittsburgh (“Pitt”), a position I held for approximately one year.
2. In that position, I ran a grant program for diversity, equity, and inclusion initiatives and planned, promoted, and produced signature University events around cultural heritage months.
3. In addition to that role, I am also a trained member of a pool of Pitt staff that serve as conduct hearing board members.
4. I have been a member of this pool for approximately 8 years.
5. Conduct hearing board members hear the testimony and arguments, and review any evidence, that may be presented by Pitt and a student or student organization accused of violating Pitt policies during a Level II hearing.
6. Upon completion of a Level II hearing, the conduct hearing board members then deliberate in private to determine whether the student or student organization is responsible, or is not responsible, for violating Pitt policy, based on a preponderance of the evidence.

7. The conduct hearing board members are then required to prepare a written report of their findings, summarizing the reasons for those findings, and, if applicable, recommending a sanction for any violation found to have occurred, along with a rationale for that sanction.

8. The conduct hearing board members for any particular hearing are selected through a survey of members who are asked their availability on a given date and time.

9. I have served on approximately 20 conduct hearing boards for Level II hearings.

10. I was selected to serve on a conduct hearing board on February 4, 2025, to hear allegations against Students for Justice in Palestine at Pitt (“SJP-Pitt”).

11. Those allegations concerned an event held by SJP-Pitt at the University’s library.

12. To the best of my recollection, prior to serving on this conduct hearing board, I had no direct interaction with SJP-Pitt.

13. The conduct hearing board consisted of myself and two other Pitt administrators.

14. Upon conclusion of the hearing on February 4, 2025, the conduct hearing board deliberated, but did not complete those deliberations during our meeting that day. We decided we would meet again the next day to continue our deliberations.

15. Late in the evening on February 4, 2025, I received an email, that I reviewed that night, from SJP-Pitt that, among other things, “demand[ed]” the “complete dismissal of all disciplinary proceedings against SJP[-Pitt].”

16. Defendants’ Exhibit 4, attached to this Declaration, is a true and correct copy of the email that I received.

17. I reviewed the email that same night.

18. The other two members of the conduct hearing board received the same email.

19. I was concerned that the email potentially introduced new information outside the conduct hearing that could impact the integrity of the conduct hearing board's deliberation.

20. On February 5, 2025, the day after receiving SJP-Pitt's email, we – the conduct hearing board – met to continue our deliberations.

21. We were advised by the hearing moderator that we should disregard anything contained in the email when we continued our deliberations.

22. During the continued deliberations, I reminded the other conduct hearing board members that we could not consider any new information presented in the email that was not presented during the conduct hearing.

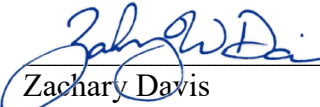
23. One of the other hearing board members appeared to have been negatively affected by SJP-Pitt's email.

24. The conduct hearing board never finalized its recommendation.

25. To the best of my recollection, I have never before received a communication, such as SJP-Pitt's email or otherwise, from a conduct hearing participant before or after a Level II conduct hearing that related to the conduct hearing or demanded that a conduct process be dismissed.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 30, 2025


Zachary Davis

From: [SJP at Pitt](#)
To: [Joan Gabel](#); [Dean of Students](#); [Carla Panzella \(She/Her\)](#); [Karin Asher](#); [DaVaughn Vincent-Bryan](#); [Day, David Stephen](#); [Davis, Zachary Wayne](#); [Tuscano, Jennifer L](#); [Scott, Carlton J](#)
Cc: [Diversity](#); [Darr, Jay](#); [Pickett, Clyde Wilson](#); [Craven, Lorraine A.](#); [Karen B Sykes](#); [Landy, Matthew E](#); [Mentzer, Jamey](#); [Palmer, Calli](#); [Natter, Gretchen Carlson](#); [Kathleen Lamansky](#)
Subject: Open Letter Condemning the University of Pittsburgh's Suppression of Pro-Palestinian Voices
Date: Tuesday, February 4, 2025 9:52:52 PM
Attachments: [Open Letter Condemning the University of Pittsburgh's Suppression of Pro-Palestinian Voices.pdf](#)

We, the undersigned organizations, condemn **the selective repression of Students for Justice in Palestine (SJP)** at the University of Pittsburgh. As the **only Palestinian cultural and advocacy organization on campus**—led by **Palestinian, Arab, and Muslim students**—SJP is being unfairly targeted with **heightened scrutiny and politically driven disciplinary actions**.

In a **blatant act of political suppression**, the University has targeted SJP with proposed sanctions that include **effective suspension** through May 2025, as well as probation through December 2025. Meanwhile, multiple registered pro-Israel advocacy organizations continue to operate without interference, **despite consistent harassment of SJP and its members**. One of these organizations, Students Supporting Israel, has repeatedly collaborated with **Betar USA**—an organization unaffiliated with the university that **issued bomb threats against SJP's general body** in November 2024. By **failing to take action in response to these threats**, the university has **effectively emboldened Betar**; the group has since provided the Trump administration with a list of international students, **targeting them for deportation due to their alleged pro-Palestine stance**.

From the time SJP leadership first met with Student Conduct staff on January 22, they were given **just six days to submit their evidence and witnesses**, despite the university having built its case against them **for over a month and a half**. Student Conduct staff also demanded that SJP leadership **submit in advance all questions they planned to ask during the hearing**, a directive that was later **retracted** upon questioning by SJP representatives—raising serious concerns about the fairness and transparency of the disciplinary process.

This latest act of repression is only the latest in a wave of disciplinary measures taken by University of Pittsburgh administration, including **surveilling, defunding, and relocating** SJP events—all justified by vague and inconsistently applied policies. These actions not only **disproportionately penalize students of color** for speaking out against apartheid and state violence but also set a dangerous precedent that will **erode the free speech and organizational rights of all Pitt affiliates**.

In light of the university administration's blatant attempt to silence pro-Palestine voices, we demand:

1.

The complete dismissal of all disciplinary proceedings against SJP.

2.

Transparency in university conduct policies and equitable application of these policies.

3.

An end to the University's suppression of Palestinian advocacy on campus.

We refuse to allow this university to **silence marginalized voices**. Advocacy for the rights of the Palestinian people is **not** a crime.

Signed,

University of Pittsburgh Affiliated Organizations:

1.
Students for Justice in Palestine
2.
Faculty and Staff for Justice in Palestine
3.
University of Pittsburgh School of Law
4.
Muslim Student Association (MSA)
5.
Jewish Students' Bund
6.
Middle Eastern and North African Student Association (MENASA) at Pitt
7.
Asian Student Alliance (ASA)
8.
Rainbow Alliance
9.
Women of Color Collective (WOCC)
10.
Latinx Student Association (LSA)
11.
Kya Baat Hai
12.
The Fann Club
13.
Luso-Brazilian Student Association
14.
Alliance of Queer Underrepresented Asians in Recognition of Intersectionality to

Uphold Solidarity (AQUARIUS)

15. Japanese Student Association (JSA)
16. PRISM at Pitt
17. Trans Action Building
18. Progressive Students for Change at Pitt
19. Student Disability Coalition
20. Autistic Students Union at Pitt
21. Humanity First at Pitt
22. ACLU Club at Pitt
23. Direct Action Coalition (DAC)
24. Pittsburgh Policy Initiative
25. Behavioral Economics Club
26. The Letter Project at Pitt
27. COVID Safe Panthers
28. Pitt Divest From Apartheid

Community Organizations:

- 1.

Council on American Islamic Relations - Philadelphia

2. Pittsburgh Palestine Coalition
3. Harrisburg Palestine Coalition
4. Islamic Center of Pittsburgh
5. Jewish Voice for Peace - Pittsburgh
6. Ratzon: Center for Healing & Resistance
7. BDS Pittsburgh
8. Black Socialist Formation
9. New Afrikan Independence Party (NAIP)
10. Asian Pacific Islander Political Alliance
11. Alliance of South Asian Progressives in Pittsburgh (ASAPP)
12. Rangoli Pittsburgh
13. Pittsburgh Arab Music Ensemble
14. Karavansarai
15. Carnegie Mellon College Progressives
16. Middle Eastern and North African Student Association at **CMU**

17. Rojava Solidarity Committee
18. Veterans For Peace, Pittsburgh Chapter 047
19. UE Local 667
20. UE Local 690
21. Healthcare Workers for Palestine - Pittsburgh Chapter
22. Western PA Coalition for Single Payer Healthcare
23. Tri-state Abortion Action
24. Sunrise Movement Pittsburgh
25. Steel City Anti-Fascist League
26. Our Streets Collective
27. Against Carceral Tech
28. Mask Up Pittsburgh
29. Howmet Accountability Project
30. Pittsburgh Palestine Solidarity Committee
31. Friends of Sabeel North America (FOSNA) - Pittsburgh
- 32.

Southwestern PA Women's Coalition

33. Take Action Mon Valley
34. Stay Gold Books
35. Valley View Church
36. Green Party of Allegheny County
37. Pittsburgh Green New Deal
38. Project for Responsive Democracy
39. Pittsburgh Branch of Communist Party USA
40. Pittsburgh Branch of Democratic Socialists of America
41. Pittsburgh Branch of the Party for Socialism & Liberation
42. ANSWER Coalition Pittsburgh
43. West Virginia University Muslim Students' Association
44. River Valley for Gaza Healthcare
45. Wayne State University Faculty and Staff for Justice in Palestine
46. SCAD Students for Justice in Palestine